Comments to RM-11305
Mark S. Bell K3MSB

In general, I support the proposal specified in RM-11305 and request the FCC to adopt it with modifications.

The United States is the only country in the world with subband restrictions. RM-11305 will bring the United States into step with the rest of the world. In discussing this proposal with other amateurs over the past few months, the most common reason I've heard against it is the fear that anarchy will prevail on the amateur bands without strict government regulation. My response to this "doom and gloom" position has been three-fold. First, I ask why anarchy does not currently exist on the amateur bands as the result of amateurs in every other country of the world. No plausible explanation has been evidenced. Secondly, our neighbor to the north, Canada, relaxed subband restrictions years ago without the result of anarchy. Finally, why has anarchy not prevailed on the current 160M amateur band?

Mr. David Sumner K1ZZ, Chief Executive Officer & Secretary of the ARRL, writes on Page 9 of the October 2005 issue of QST: "When asked politely to move their ragchew off the DX calling frequency, most newcomers to 6 meters don't respond by demanding to know where in the FCC regulations it says they must. Enthusiasts of classic AM equipment and slow-scan television don't spread out all over the phone bands; they congregate on a few spot frequencies. Except for a few hours of intense contest activity per year, on 160 meters the overwhelming majority of phone operators stay out of the low end of the band and CW operators stay out of the high end. Most of the time, most of us don't need FCC rules to tell us to do the right thing". QST is published by the American Radio Relay League (ARRL).

To be sure, there will be a transitional period in which those that have spent decades in the comfort of the current government subbands will find the "brave new world" very unsettling, but change is the nature of things, and the changes proposed in RM-11305 can only help amateur radio in the long term. Less regulation will foster experimentation as repeated cycles of government re-regulation are eliminated. I believe any short-lived instability will more than pay for itself in amateur radio's future.

While I support RM-11305, I feel that in addition to the government regulation of band edges and power levels, bandwidth still requires minimal regulation.

We must face the reality of an increasing number of amateurs operating on phone (AM and SSB), the desire of the digital community (still in it's infancy) for faster data rates, and the limited HF frequency spectrum available. I feel these issues require regulation of maximum necessary bandwidth, but at a minimal level. I propose the following:

Wavelength (Band)	**Frequencies Authorized**	**Maximum Necessary Bandwidth**	**Standards See 97.307(f) Paragraph:**
160M	1.800 – 2.000 MHz	10 Khz	None
75M	3.500-4.000 MHz	10 Khz	None
40M	7.000 – 7.300 MHz	10 Khz	None
30M	10.100-10.150 MHz	10 Khz	None
20M	14.000-14.350 MHz	10 Khz	None
17M	18.068-18.168 MHz	10 Khz	None
15M	21.000-21.450 MHz	10 Khz	None
12M	24.890-24.990 MHz	10 Khz	None
10M	28.00-29.700 MHz	16 Khz	None

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While I am enthusiastic about the removal of government mandated subbands in general, one area where I feel they are still required is that of automatically controlled stations. I propose that no changes be made to the existing Part 97.221.

The primary purpose of automatically and semi-automatically controlled stations, typically referred to as “robot” stations, is to deliver electronic messages (email) via amateur radio. This is typically accomplished via Winlink 2000 utilizing the Pactor-III protocol.

From http://www.winlink.org/: “Winlink 2000 Utilizes enabling technologies and sound operating practices to provide a full-featured radio digital message transfer system, worldwide. Email transfer with attachments, position reporting, graphic and text-based weather bulletins and emergency communications are now available to the Amateur radio community by linking radio to the Internet.”

While this type of digital message transfer capability over amateur radio serves a need during emergency situations, it should not be used in place of commercial Internet Service Providers (ISP). The existing Part 97.221 rules provide adequate spectrum for the type of experimentation required to provide an email type delivery service via amateur radio in times of emergency.

My concern with letting this type of automated communications have access to the full HF spectrum is harmful interference to existing communications. The problem arises when the locally controlled station specifies multiple robot frequencies to use and initiates the transmission process. The control operator can not determine if multiple frequencies are always free of on-going communications.

The use of the entire HF spectrum for semi-automatic / automatic robot interactions is only justified if one wants an amateur digital message transfer system to be extremely quick and not potentially delayed by the restricted bandwidth available under the current Part 97.221 regulations. If amateurs desire fast email and image transmissions they should use a commercial ISP.

Respectfully Submitted

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